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Barry Orr Chairman & CEO September 20, 2005

Mr. John F. Carter Regional Director Federal Deposit Insurance Corporation San Francisco Regional Office 25 Jesse Street, Suite 2300 San Francisco, CA 94105

Re: WalMart application for deposit insurance

Dear Mr. Carter:

On behalf of the Directors, Officers, and Employees of First Bank and Trust, Lubbock, Texas, we implore you to deny the application for deposit insurance coverage from WalMart.

The mix of banking and commerce has been denied by Congress and more recently reaffirmed by the Gramm-Leach-Bliley Act. The conflicts of interest by mixing banking and commerce would jeopardize our highly regarded banking industry. Furthermore, the destabilizing of community banking would be a far greater risk to our economy. Many of our independent grocers, pharmacies, and hardware stores have been driven out of communities as WalMart has flexed the power of their vast resources.

Please consider the unprecedented concentration of economic power and its impact on our country. We again reiterate our concern and request a denial of FDIC insurance coverage for WalMart.

Sincerely,

Barry Orr

Chairman/CEO

7806 Indiana Ave. – Lubbock, TX 79423

BHO/md

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fax: 806.788.2828 www.firstbanklubbock.com

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